

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

IN RE:
Holly Kristina Hudson
Debtor(s).

CHAPTER 13

CASE NO. 13-54442

JUDGE C. RAY MULLINS

OBJECTION TO CONFIRMATION

COMES NOW, Credit Acceptance Corp. (“Movant”), creditor and interested party in the above Debtor's case, and as its Objection to Confirmation of the Debtor's proposed plan, shows this Court as follows:

1.

That the Debtor on March 1, 2013 filed a petition for relief under Chapter 13 of the Bankruptcy Code.

2.

That the Debtor is indebted to Movant in the sum of \$8,733.62 on an installment sales contract for the purchase of a 2001 Chevrolet Suburban VIN 3GNFK16TX1G130240 automobile.

3.

That the plan of payment proposed by the Debtor does not comply with the provisions of §1325 of the Bankruptcy Code.

4.

Movant further objects on the grounds that the Debtor's plan does not pay Movant the replacement value of its collateral and that the proposed rate of interest is insufficient to pay Movant the present value of its claim.

5.

That the proposed initial monthly payments are insufficient. The payments must be increased to provide for adequate protection on the vehicle.

6.

That the debt is co-signed but the proposed plan does not protect the co-signer. In order to protect the co-signer, the Debtor must amend its plan to treat the debt to be paid in full at the contract rate of interest of 17.99%.

WHEREFORE, Movant prays that confirmation of the Debtor's proposed plan be denied and that it have such other and further relief as is just.

McCULLOUGH PAYNE & HAAN, LLC

/s/ Lisa Ritchey Craig
Lisa Ritchey-Craig
Georgia Bar No. 606755
Attorney for Movant

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233.00201

CERTIFICATE OF SERVICE

This is to certify that I have this date served on the following a true and correct copy of the within and foregoing OBJECTION TO CONFIRMATION by placing said copy in the U.S. Mail in a properly addressed and stamped envelope:

Debtor:

Holly Kristina Hudson
6988 Fielder Rd.
Rex, GA 30273

Debtor's Attorney:

Attorney Ashley B. Brannen
7147 Jonesboro Road, Suite G
Morrow GA 30260

Chapter 13 Trustee:

Nancy J. Whaley
Suntrust Plaza Garden Offices
303 Peachtree Center Ave Ste 120
Atlanta GA 30303

This the 13th day of May, 2013

/s/ Lisa Ritchey Craig

Lisa Ritchey-Craig
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Attorney for Movant

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